

**UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF PENNSYLVANIA**

Cynthia Santiago, Administrator of the Estate of Kevante Washington,	:	
	:	No. 2:24-cv-05133
Plaintiff,	:	
	:	
v.	:	
	:	
United States of America,	:	
	:	
Defendant.	:	

**STIPULATION TO EXTEND THE STAY OF THE ACTION**

Pursuant to Local Civil Rule 7.4, plaintiff and defendant stipulate as follows:

1. On September 25, 2024, plaintiff Cynthia Santiago, the administrator of the estate of her son, Kevante Washington, initiated this civil action against the United States. *See* ECF No. 1.
2. On the same date, she filed an amended complaint, ECF No. 2, which asserts one “negligence and wrongful death” claim under the Federal Tort Claims Act, 28 U.S.C. §§ 2674–2680 (FTCA). The claim asserts that, among other things, employees of the Federal Detention Center – Philadelphia, where Washington was imprisoned, negligently failed to protect Washington from another inmate, Robert Smith, and failed to timely render medical aid to Washington after he was assaulted by Smith, allegedly resulting in Washington’s death. *See generally* ECF No. 2.
3. In light of the government’s ongoing criminal investigation of the assault and subsequent death of Washington, on December 30, 2024, the United States filed an unopposed motion for a stay of this civil action to avoid prejudice to the criminal investigation. *See* ECF No. 12.

4. The Court granted the motion and stayed this civil action for an initial period of 120 days. *See* ECF No. 14. That period ends on May 2, 2025.

5. The Court's order granting the stay requires the United States to, during the initial period of the stay, provide the Court with a report of the status of the criminal investigation. *Id.* ¶ 2.

6. The United States reports that the criminal investigation is continuing.

7. In light of the continuing criminal investigation, the parties have agreed to an extension of the stay, for the reasons set out in the initial motion for a stay, for an additional 120-day period, to September 2, 2025 (in light of the weekend and Labor Day holiday).

8. The United States reserves its right to request further extensions of the stay.

9. The parties have further agreed that, at the end of the stay period, whether on September 2, 2025 or after any further extension(s), plaintiff shall have 60 days to file a second amended complaint, which will be limited to claims brought under the FTCA.

10. The parties have further agreed that, upon plaintiff's filing of her second amended complaint, the United States shall have 60 days to file its response, by answer or motion, to plaintiff's second amended complaint.

11. Pursuant to Local Civil Rule 5.1.2, counsel for the parties consent to the submission of this stipulation with their electronic signatures below.

So stipulated:

DAVID METCALF  
UNITED STATES ATTORNEY

/s/ Emeka Igwe

EMEKA IGWE  
The Igwe Firm  
1500 JFK Boulevard, Suite 1900  
Philadelphia, PA 19102  
(215) 278-9898  
emeka@igwefirm.com

*Counsel for Plaintiff*

Dated: April 29, 2025

/s/ Rebecca S. Melley

REBECCA S. MELLEY  
ALFRED J. VOGT  
Assistant United States Attorneys  
615 Chestnut Street, Suite 1250  
Philadelphia, PA 19106  
(215) 861-8328/8416  
rebecca.melley@usdoj.gov  
alfred.vogt@usdoj.gov

*Counsel for Defendant*

Dated: April 29, 2025

BY THE COURT:

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HONORABLE MITCHELL S. GOLDBERG  
*Chief Judge, United States District Court*